ASSOCIATION FOR LOCAL TELECOMMUNICATIONS SERVICES

October 17, 2003

**VIA ELECTRONIC FILING**


**EX PARTE**

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

> Re: WC Docket No. 03-194 - *In re: Application by Qwest Communications International Inc. for Authority to Provide In-Region, InterLATA Services in Arizona*

Dear Ms. Dortch:

The Association for Local Telecommunications Services ("ALTS") hereby submits these limited Reply Comments for inclusion in the public record in WC Docket No. 03-194, *in re: Application by Qwest Communications International Inc. for Authority to Provide In-Region, InterLATA Services in Arizona*. ALTS has reviewed Eschelon's October 14, 2003 submission in the above-referenced docket and shares Eschelon's concerns about the recent anti-competitive advertising campaigns of Qwest. Since having been granted 271 authority, Qwest appears to have commenced a series of anti-competitive advertising campaigns that violate competitive principles generally and Qwest's SGATs specifically. As noted by Eschelon, the manner in which Qwest is using its technicians in these advertisements and winback efforts raises serious questions that should be reviewed by the Commission.

Qwest's pending 271 application may present the Commission with its last viable opportunity to use the Section 271 process to ensure proper practices are in place – and will remain in place – to ensure a meaningful opportunity to compete. The FCC should use this opportunity to address these issues with Qwest before any approval to avoid additional problems after approval.

Now is the time to send the message to Qwest that 271 approval is not a license to engage in anti-competitive behavior. The Commission should address this issue with

Qwest, investigate Qwest's winback tactics, and require Qwest to withdraw its anti-competitive advertisements.

Respectfully submitted,

/s/

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